

IN THE DISTRICT COURT OF THE UNITED STATES
FOR THE DISTRICT OF SOUTH CAROLINA
AIKEN DIVISION

UNITED STATES OF AMERICA)	CR. NO. 1:19-221
)	18 U.S.C. § 666(a)(1)(A)
)	26 U.S.C. § 7206(1)
v.)	18 U.S.C. § 981(a)(1)(C)
)	28 U.S.C. § 2461(c)
CHERYL JAUNICE MOLE)	<u>INFORMATION</u>

COUNT 1
(Theft of Federal Funds)

THE UNITED STATES ATTORNEY CHARGES:

At all times relevant to this Information:

1. CHERYL JAUNICE MOLE was employed by the Town of Allendale, South Carolina (“the Town of Allendale”). She began working for the Town of Allendale around 2000 as an administrative assistant for the Town Administrator, Dewayne Ennis. During or around 2017, CHERYL JAUNICE MOLE was promoted to Human Resources Director for the Town of Allendale.

2. The Town of Allendale applies for and receives funds from various Federal programs and grants. The Town of Allendale received federal funds in excess of \$10,000 for the calendar year 2015.

3. Beginning at least in 2015, CHERYL JAUNICE MOLE started siphoning funds from the Town of Allendale for personal and unofficial uses. Using a bank card issued to the Town of Allendale, CHERYL JAUNICE MOLE purchased vehicles for personal business ventures. Additionally, CHERYL JAUNICE MOLE used funds from the Town of Allendale to pay for

repairs to a family property.

4. Beginning in at least 2015, CHERYL JAUNICE MOLE also siphoned funds from the Town of Allendale by receiving payment for hours worked elsewhere. CHERYL JAUNICE MOLE would falsify time sheets representing hours worked for the Town of Allendale while working instead for another organization.

5. Beginning at least in or about January 2015 and continuing through December of 2015, in the District of South Carolina and elsewhere, Defendant, CHERYL JAUNICE MOLE, being an agent of the Town of Allendale, South Carolina, said Town of Allendale receiving in the one year period beginning January 1, 2015, benefits in excess of \$10,000 under various Federal programs providing grants and assistance, embezzled, stole, obtained by fraud, and intentionally misapplied property worth at least \$5,000 and under the care of the Town of Allendale, that is money and payments, in each one-year period;

All in violation of Title 18, United States Code, Section 666(a)(1)(A).

COUNTS 2-6
(False Statement)

THE UNITED STATES ATTORNEY FURTHER CHARGES:

6. Paragraph 1 is incorporated herein by reference.

7. That on or about the dates hereinafter set forth, in the District of South Carolina and elsewhere, Defendant, CHERYL JAUNICE MOLE, a resident of Allendale, South Carolina, did willfully make and subscribe Internal Revenue Service Forms 1040, which were verified by written declarations that they were made under the penalties of perjury and which Defendant, CHERYL JAUNICE MOLE, did not believe to be true and correct as to every material matter.

8. That the Internal Revenue Service Forms 1040, which were electronically filed with the Internal Revenue Service, stated the following taxable income and taxes due for the calendar years specified hereinafter. However, as Defendant CHERYL JAUNICE MOLE, then and there knew, her taxable income for the following calendar years was greater than the amounts reported on the tax returns, and as a result of such additional taxable income, there were additional taxes due and owing to the United States of America:

COUNT	Date filed	Tax year	Reported taxable income	Reported tax	Correct taxable income	Corrected tax
2	April 15, 2014	2013	\$0	\$0	\$32,436	\$10,140
3	April 15, 2015	2014	\$5,930	\$593	\$35,962	\$8,784
4	April 15, 2016	2015	\$0	\$440	\$33,994	\$5,674
5	April 15, 2017	2016	\$0	\$520	\$45,103	\$9,297
6	April 15, 2018	2017	\$0	\$0	\$106,728	\$34,849

All in violation of Title 26, United States Code, Section 7206(1).

FORFEITURE

1. THEFT OF FEDERAL FUNDS:

As a result of the foregoing violation of 18 U.S.C. § 666, as charged in this Information, upon conviction, Defendant, CHERYL JAUNICE MOLE, shall forfeit to the United States any property, real or personal, which constitutes or is derived from any proceeds the Defendant obtained, directly or indirectly, as a result of such violation, and any property traceable to such property.

2. PROPERTY:

Pursuant to 18 U.S.C. § 981(a)(1)(C), and 28 U.S.C. § 2461(c), the property which is subject to forfeiture upon conviction of Defendant for the violation charged in this Information includes, but is not limited to, the following:

Forfeiture Judgment:

A sum of money equal to all proceeds Defendant obtained, directly or indirectly, from the offense charged in this Information, that is, a minimum of approximately \$94,999 in United States currency, and all interest and proceeds traceable thereto, and/or that such sum equals all property derived from or traceable to her violation of 18 U.S.C. § 666.


3. SUBSTITUTE ASSETS:

If any of the property described above, as a result of any act or omission of Defendant-

- (1) cannot be located upon the exercise of due diligence;
- (2) has been transferred or sold to, or deposited with, a third party;
- (3) has been placed beyond the jurisdiction of the court;
- (4) has been substantially diminished in value; or
- (5) has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States, pursuant to 21 U.S.C. § 853(p) to seek forfeiture of any other property of the said Defendant up to the value of the forfeitable property described above.

All pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c).



SHERRI A. LYDON (alr)
UNITED STATES ATTORNEY